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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	NO. 15 Cr. 582 WHO
Plaintiff,)	
v.)	STIPULATED MOTION AND
)	[PROPOSED] ORDER SHORTENING
ADAM SHAFI,)	TIME FOR MOTION FOR REVIEW OF
)	DETENTION ORDER
Defendant)	Date: January 14, 2016
)	Time: 1:30 p.m.

PLEASE TAKE NOTICE that on January 14, 2016 at 1:30 p.m., defendant Adam Shafi will move for review of the magistrate court detention order. [Dkt. 30], which was issued earlier today. The parties have stipulated that the motion for review be made on a shortened schedule, with the defense Motion for Review of the Detention Order to be filed on or before January 8, 2016, and the government opposition to be filed on or before January 12, 2016. *See* L.R. 47-1(a)(3); 47-2(a). The parties agree that the Stipulated

STIPULATED MOTION
SHORTENING TIME FOR
REVIEW OF DETENTION ORDER
CR 15-0582 WHO

1 Motion Shortening Time may be granted based on this stipulated motion and the
2 declaration of counsel below, and without oral argument.

3 **Declaration of Counsel**

4 1. Along with Joshua L. Dratel, I represent Mr. Adam Shafi in the above-
5 captioned matter and I submit this declaration in support of Mr. Shafi's Stipulated Motion
6 Shortening Time for Motion for Review of Detention Order. I present the following
7 based on information and belief.

8 2. On July 3, 2015, Mr. Shafi was arrested on a Complaint that alleged an
9 attempt to provide material support to a foreign terrorist organization in violation of 18
10 U.S.C. § 2339B. [Dkt. 1]. The Court ordered the matter sealed, [Dkt. 2], and it remained
11 under seal in its entirety until Mr. Shafi was arraigned on an Indictment December 17,
12 2015. [Dkt. 18].

13 3. On December 22, 2015, the magistrate court conducted a bail hearing and
14 ordered the Mr. Shafi be detained and set the matter for status conference before this
15 Court on January 14, 2106 at 1:30 p.m. [Dkt. 23]. On January 5, 2016, the magistrate
16 court issued its written order detaining Mr. Shafi. [Dkt. 30]. A transcript of the detention
17 hearing has been prepared. [Dkt. 27].

18 4. Mr. Shafi can file his motion for review of the detention order on or before
19 January 8, 2016, and the government has agreed to file its opposition to the motion on or
20 before January 12, 2016.

Certificate of Service

I hereby certify that on January 5, 2016, I filed the foregoing **STIPULATED MOTION AND [PROPOSED] ORDER SHORTENING TIME FOR MOTION FOR REVIEW OF DETENTION ORDER** with the Clerk of the United States District Court for the Northern District of California by using the CM/ECF system.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 5, 2016.

s/Erik B. Levin
Erik B. Levin, Esq.